

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
(HARRISBURG)**

**In Re:**

**Wesley Matthew Kunkel**

: Chapter 13

: Case No. 1:23-bk-01205-HWV

**Debtor**

: 11 U.S.C. §362(d) and §1301

US Bank Trust National Association,  
Not In Its Individual Capacity But Solely  
As Owner Trustee For VRMTG Asset Trust

Movant

v.

**Wesley Matthew Kunkel**

: Hearing: February 6, 2024 at 9:30 a.m.

Debtor

and

Jack N. Zaharopoulos, Esquire  
Trustee

Respondents

**CERTIFICATE OF NON-CONCURRENCE**

The undersigned, Attorney for Movant, hereby certifies that the parties listed below were contacted prior to the filing of the Motion for Relief from Automatic Stay and Co-Debtor Stay and that said parties do not concur with the entry of the Order granting the Movant Relief from the Automatic Stay and Co-Debtor Stay.

- Debtor's counsel was contacted regarding whether he concurs with the entry of the Order as stated above. No response was given to this inquiry and no concurrence was given. Therefore, counsel for Movant files this Certificate of Non-Concurrence.
- The Trustee was contacted regarding whether he concurs with the entry of the Order as stated above. Because there was no response from the Debtor's attorney, the Trustee took no position.

Date of Contact: December 13, 2023

Parties Contacted via email:

Michael A. Cibik, Esquire  
Jack N. Zaharopoulos

Dated: January 9, 2024

By:/s/BRIAN E. CAINE  
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